

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND

IN RE: Gerald R. Galleshaw	:	Case No. 15-bk-11047
Debtor	:	
	:	
David C. Fraioli and New	:	
England Auto Center, Inc.	:	
Plaintiff	:	Chapter 7
	:	
v.	:	Ad Pro No. 15-ap-01023
	:	
Gerald R. Galleshaw	:	
Defendant	:	

**APPLICATION TO CLERK FOR ENTRY OF DEFAULT**

I, Todd S. Dion, Esq., counsel for Debtor/Defendant, in accordance with the Federal Rules of Bankruptcy Procedure 7055 and Rule 55(a) of the Federal Rules of Civil Procedure, hereby make this Application for Entry of Default against Plaintiffs David C. Fraioli and New England Auto Center, Inc., for failure to plead or otherwise defend against Defendant's Counterclaims filed January 19<sup>th</sup>, 2016.

The failure of Plaintiffs to plead or otherwise defend is set forth in the accompanying affidavit filed herewith.

Respectfully Submitted,  
Debtor/Defendant, Gerald Galleshaw,  
By his Attorney,

/s/ Todd S. Dion  
Todd S. Dion Esq. (#6852)  
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North Providence, RI 02911  
401-965-4131 Phone  
toddsdion@msn.com

April 28, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28<sup>th</sup>, 2016, I electronically filed the forgoing document in the above captioned matter with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF system. CM/ECF participants will receive notice electronically.

/s/ Todd S. Dion  
Todd S. Dion Esq.